INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
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NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Milliken Millwork, Inc.
2701 South Coliseum Boulevard, Suite 1199
Fort Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-15236-00262	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wood door and molding finishing operation.

Authorized Individual:	Robert D. Frede, Manager
Source Address:	2701 South Coliseum Boulevard, Suite 1199, Fort Wayne, Indiana 46803
Mailing Address:	2701 South Coliseum Boulevard, Suite 1199, Fort Wayne, Indiana 46803
General Source Phone Number:	260-426-8807
SIC Code:	1751
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and/or operate the following emissions units and pollution control devices:

(a) one (1) high volume low pressure (HVLP) stain booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, and exhausting at one (1) stack (ID No. 1);

(b) two (2) high volume low pressure (HVLP) finish booths, identified as Finish Booth #1 and Finish Booth #2, each coating a maximum of twenty-five (25) wood doors per hour, each using dry filters for overspray control, and each exhausting at one (1) stack (ID Nos. 2 and 3);

(c) two (2) vacuum finish coaters, identified as Vacuum Coater #1 and Vacuum Coater #2, each coating a maximum of five thousand (5,000) wood moldings per hour, each using a baffle/dry filters system for overspray control, and each exhausting at one (1) stack (ID Nos. 5 and 6);

(d) one (1) high volume low pressure (HVLP) spray booth, identified as the Combo Booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, exhausting at one (1) stack;

(e) one (1) airless spray coater, coating a maximum of three thousand six hundred (3,600) feet of wood molding per hour, using dry filters for overspray control, exhausting at one (1) stack;

(f) two (2) natural gas-fired drying ovens, each rated at 0.441 million British thermal units (MMBtu) per hour;

(g) seven (7) natural gas-fired space heaters, each rated at 0.25 MMBtu per hour;

(h) one (1) natural gas-fired dry room heater, rated at 0.06 MMBtu per hour;

(i) one (1) natural gas-fired over head heater, rated at 0.075 MMBtu per hour;

(j) one (1) wood door sander, with a maximum throughput of 630 square feet of wood doors per hour, equipped with a bag type collection system, exhausting inside the building; and

(k) one (1) wood molding sander, with a maximum throughput of 750 feet of wood molding per hour, equipped with a bag type collection system, exhausting inside the building.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction of the spray coater is not commenced within eighteen (18) months after receipt of this approval or if construction of the spray coater is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction for the spray coater shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring

compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of each criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-

way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited,

pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(a) one (1) high volume low pressure (HVLP) stain booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, and exhausting at one (1) stack (ID No. 1);

(b) two (2) high volume low pressure (HVLP) finish booths, identified as Finish Booth #1 and Finish Booth #2, each coating a maximum of twenty-five (25) wood doors per hour, each using dry filters for overspray control, and each exhausting at one (1) stack (ID Nos. 2 and 3);

(c) two (2) vacuum finish coaters, identified as Vacuum Coater #1 and Vacuum Coater #2, each coating a maximum of five thousand (5,000) wood moldings per hour, each using a baffle/dry filters system for overspray control, and each exhausting at one (1) stack (ID Nos. 5 and 6);

(d) one (1) high volume low pressure (HVLP) spray booth, identified as the Combo Booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, exhausting at one (1) stack;

(e) one (1) airless spray coater, coating a maximum of three thousand six hundred (3,600) feet of wood molding per hour, using dry filters for overspray control, exhausting at one (1) stack;

(f) two (2) natural gas-fired drying ovens, each rated at 0.441 million British thermal units (MMBtu) per hour;

(g) seven (7) natural gas-fired space heaters, each rated at 0.25 MMBtu per hour;

(h) one (1) natural gas-fired dry room heater, rated at 0.06 MMBtu per hour;

(i) one (1) natural gas-fired over head heater, rated at 0.075 MMBtu per hour;

(j) one (1) wood door sander, with a maximum throughput of 630 square feet of wood doors per hour, equipped with a bag type collection system, exhausting inside the building; and

(k) one (1) wood molding sander, with a maximum throughput of 750 feet of wood molding per hour, equipped with a bag type collection system, exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood doors and wood moldings shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating

Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the stain booth, the two (2) finish booths, the two (2) vacuum coaters, the spray coater, and the combo booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Any change or modification which may increase potential to emit of VOC, any single HAP, or total HAPs to 100, 10, or 25 tons per year, respectively, from this source shall cause this source to be considered a Part 70 source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to verify that VOC and HAP emissions are below the 326 IAC 2-7 (Part 70) applicability threshold.

(1) The VOC and HAP content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage; and

(4) The total VOC and HAP usage for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Milliken Millwork, Inc.**
Address:	**2701 South Coliseum Boulevard, Suite 1199**
City:	**Fort Wayne, Indiana 46803**
Phone #:	**260-426-8807**
MSOP #:	**003-15236-00262**

I hereby certify that Milliken Millwork, Inc. is
9 still in operation.
9 no longer in operation.

I hereby certify that Milliken Millwork, Inc. is
9 in compliance with the requirements of MSOP 003-15236-00262.
9 not in compliance with the requirements of MSOP 003-15236-00262.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Milliken Millwork, Inc. __PHONE NO. (260) 426-8807
LOCATION: (CITY AND COUNTY) Fort Wayne, Indiana, Allen County
PERMIT NO. 003-15236 _ AFS PLANT ID: 003-00262 AFS POINT ID: _____INSP: Jennifer Dorn
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

PAGE 2 OF 2

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a New Source Construction and Minor Source Operating Permit

Source Name:	Milliken Millwork, Inc.
Source Location:	2701 South Coliseum Blvd., Suite #1199, Fort Wayne, IN 46803
County:	Allen
SIC Code:	1751
Operation Permit No.:	003-15236-00262
Permit Reviewer:	Trish Earls/EVP

On October 14, 2002, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Milliken Millwork, Inc. had applied for a permit to construct and operate a wood door and molding finishing operation with dry filters as air pollution control. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

There were no comments received on the proposed permit.

Upon further review, the OAQ has decided to make the following revisions to the permit (new language is bolded, deleted language is in strikeout):

1. Section A.1 (General Information) has been revised so that the title of the authorized individual is added. The reference to the source's phone number has been changed so that it is referred to as a general source phone number indicating that it is a general number for the source. "County Status" has been replaced with "Source Location Status" in order to clarify when only portions of a county are non-attainment. Section A.1 is revised to read as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wood door and molding finishing operation.

Authorized Individual:	Robert D. Frede**, Manager**
Source Address:	2701 South Coliseum Boulevard, Suite 1199, Fort Wayne, Indiana 46803
Mailing Address:	2701 South Coliseum Boulevard, Suite 1199, Fort Wayne, Indiana 46803
General Source Phone Number:	260-426-8807
SIC Code:	1751
County Location:	Allen
~~County~~ **Source Location** Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

2. Condition B.2 (Definitions) has been revised as follows:

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

3. A new condition, now numbered B.5 (Permit Term and Renewal), has been added to the permit. The conditions following have been renumbered. The condition previously numbered B.7, Permit Term, has been deleted.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

~~B.7 Permit Term [326 IAC 2-6.1-7]~~

~~This permit is issued for a fixed term of five (5) years form the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.~~

4. Paragraph (a)(2) of condition B.6, now B.7, has been revised and paragraph (e) was removed, because this language was incorporated into the Permit Term condition above.

B.~~6~~**7** Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction for the spray coater shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) ~~If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.~~ **If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.**

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New

Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

~~(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.~~

5. Condition C.17, Annual Notification, has been moved to Section B from Section C.

~~C.17~~**B.8** Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

6. Condition C.2, Preventive Maintenance Plan, has been moved to Section B from Section C. The language “Preventive Maintenance Plans” has been replaced with “PMPs” throughout the condition, since it has already been defined. In paragraph (c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it. Also, the record keeping requirements have been added to this condition.

~~C.2~~**B.9** Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP**s**) **within ninety (90) days** after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement ~~the Preventive Maintenance Plan~~ **a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMPs shall be submitted to IDEM, OAQ, upon request **and within a reasonable time,** and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its ~~Preventive Maintenance Plan~~ **PMPs** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

7. Condition C.3, Permit Revision, has been moved to Section B from Section C. Paragraph (a) has been revised because IDEM does not want a source to be liable for both a permit violation and a rule violation. By changing this language IDEM is merely referencing the requirements and not mandating compliance with it. In the last sentence of paragraph (b), "should" has been replaced with "shall". The use of the word "shall" is more enforceable and will prevent sources from indicating they aren't required to certify. Also, "the" authorized individual has been replaced with "an" authorized individual, because the rule does not specify that it has to be one individual; this change will be made throughout the permit.

~~C.3~~**B.10** Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) ~~The Permittee must comply with~~ **Permit revisions are governed by** the requirements of 326 IAC 2-6.1-6 ~~whenever the Permittee seeks to amend or modify this permit~~.

(b) Any application requesting an amendment or modification of this permit shall be submitted

to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

8. Condition C.4, Inspection and Entry, and condition C.5, Transfer of Ownership, have both been moved to Section B from Section C.

~~C.4~~**B.11** Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

~~C.5~~**B.12** Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

9. Condition B.13 Annual Fee Payment was added to the permit.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

10. A new condition C.1, Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour, has been added to the MSOP. All subsequent conditions have been re-numbered.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

11. In condition C.6, now re-numbered C.3, Permit Revocation, the rule cite was corrected.

C.~~6~~**3** Permit Revocation ~~[326 IAC 2-1-9]~~ **[326 IAC 2-1.1-9]**

Pursuant to ~~326 IAC 2-1-9(a)~~ **326 IAC 2-1.1-9** (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

12. In condition C.8, now re-numbered C.5, the statement that "326 IAC 6-4-2(4) is not federally

enforceable" has been removed.

C.~~8~~**5** Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

13. A new condition C.6, Asbestos Abatement Projects, has been added to the MSOP.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

14. Condition C.9 (Performance Testing), now re-numbered C.7, has been rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the authorized individual. In paragraph (c) "within" has been changed to "not later than".

C.~~9~~**7** Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

~~(b)~~**(c) Pursuant to 326 IAC 3-6-4(b), all** ~~All~~ test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized~~

~~individual" as defined by 326 IAC 2-1.1-1.~~

15. Condition C.8, Compliance Requirements, is a new condition that refers to IDEM, OAQ's general compliance authority in 326 IAC 2-1.1-11.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

16. The following rule cites have been added to condition C.11, Monitoring Methods, now re-numbered as C.10.

C.1~~1~~**0** Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60, Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

17. Condition C.12, Compliance Monitoring Plan - Failure to Take Response Steps, has been removed from the permit since there are no applicable compliance monitoring requirements for this source.

~~C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]~~

~~(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :~~

~~(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~

~~(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

~~(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~

~~(c) After investigating the reason for the excursion, the Permittee is excused from taking any further response steps for any of the following reasons:~~

~~(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or.~~

~~(3) An automatic measurement was taken when the process was not operating; or.~~

~~(4) The process has already returned to operating within "normal" parameters and no response steps are required.~~

~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~

18. Since there are no compliance monitoring requirements applicable to this source, condition C.14, Monitoring Data Availability, is not required and has been removed from the permit.

~~C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

~~(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required~~

~~observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

19. Condition C.15 (General Record Keeping Requirements), now re-numbered C.12, has been revised to be more consistent with the rules and to assure sources that they get a “reasonable time” to produce records no matter how or when IDEM, OAQ asks for them. The term “monitoring” was removed so that the condition will seem more generalized to all record keeping, and the term “reports” was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary.

C.15**2** General Record Keeping Requirements [326 IAC 2-6.1-~~2~~ **5**]

(a) Records of all required ~~monitoring~~ data**, reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit, a** ~~A~~ll record keeping requirements not already legally required shall be implemented when operation begins.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	**Milliken Millwork, Inc.**
Source Location:	**2701 South Coliseum Blvd., Suite #1199, Fort Wayne, IN 46803**
County:	**Allen**
SIC Code:	**1751**
Operation Permit No.:	**003-15236-00262**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Quality (OAQ) has reviewed an application from Milliken Millwork, Inc. relating to the construction and operation of a wood door and molding finishing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) one (1) high volume low pressure (HVLP) stain booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, and exhausting at one (1) stack (ID No. 1);

(b) two (2) high volume low pressure (HVLP) finish booths, identified as Finish Booth #1 and Finish Booth #2, each coating a maximum of twenty-five (25) wood doors per hour, each using dry filters for overspray control, and each exhausting at one (1) stack (ID Nos. 2 and 3);

(c) two (2) vacuum finish coaters, identified as Vacuum Coater #1 and Vacuum Coater #2, each coating a maximum of five thousand (5,000) wood moldings per hour, each using a baffle/dry filters system for overspray control, and each exhausting at one (1) stack (ID Nos. 5 and 6);

(d) two (2) natural gas-fired drying ovens, each rated at 0.441 million British thermal units (MMBtu) per hour; and

(e) five (5) natural gas-fired space heaters, each rated at 0.25 MMBtu per hour.

Note: the one (1) vacuum stain coater that exhausted through stack ID No. 4 has been removed from the source.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

(a) one (1) high volume low pressure (HVLP) spray booth, identified as the Combo Booth, coating a maximum of ten (10) wood doors per hour, using dry filters for overspray control, exhausting at one (1) stack;

(b) one (1) airless spray coater, coating a maximum of three thousand six hundred (3,600) feet of wood molding per hour, using dry filters for overspray control, exhausting at one (1) stack.

(c) two (2) natural gas-fired space heaters, each rated at 0.25 MMBtu per hour;

(d) one (1) natural gas-fired dry room heater, rated at 0.06 MMBtu per hour;

(e) one (1) natural gas-fired over head heater, rated at 0.075 MMBtu per hour;

(f) one (1) wood door sander, with a maximum throughput of 630 square feet of wood doors per hour, equipped with a bag type collection system, exhausting inside the building; and

(g) one (1) wood molding sander, with a maximum throughput of 750 feet of wood molding per hour, equipped with a bag type collection system, exhausting inside the building.

Note: Only the spray coater has the potential to emit of greater than 25 tons per year. All other new units have potential emissions that are at exempt levels.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 003-6323-00262, issued on May 16, 1997; and

(b) AA 003-14191-00262 (Transfer of Ownership), issued on April 17, 2001.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	Stain Booth	24.0	2.25	8,450	ambient
2	Finish Booth #1	19.0	2.25	8,450	ambient
3	Finish Booth #2	24.0	2.25	8,450	ambient
5	Vacuum Coater #1	4.0	0.33	300	140
6	Vacuum Coater #2	4.0	0.33	300	140

Combo Booth	Combo Booth	24.0	2.5	12,300	ambient
Spray Coater	Spray Coater	24.0	N/A	900	ambient

N/A = not available

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 15, 2002, with additional information received on March 5, 2002 and September 10, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit of New Units (tons/yr)	Potential To Emit of Source (tons/year)
PM	38.84	87.49
PM-10	38.85	87.56
SO_2	negl. (<0.1)	0.01
VOC	12.33	70.18
CO	0.23	1.02
NO_x	0.28	1.21

HAP's	Potential To Emit of Source (tons/year)
benzene	less than 1.0
formaldehyde	less than 1.0
hexane	less than 1.0
toluene	less than 1.0
nickel	less than 1.0
TOTAL	less than 25.0

Note: only the five HAPs emitted in the greatest quantities are shown.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. Since the potential to emit of PM and PM10 from the new units are greater than 25 tons per year, this permit is intended to satisfy the requirements of the construction permit rules for these units.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	less than 250
PM10	less than 250
SO_2	less than 250
VOC	less than 250
CO	less than 250
NO_x	less than 250

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on CP 003-6323-00262, issued on May 16, 1997.

Proposed Modification and Existing Source

PTE from the proposed modification and existing source (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Existing Units	4.12	4.17	0.01	57.85	0.78	0.93
New Units						
Combo Booth and Spray Coater*	4.77	4.77	0.0	12.31	0.0	0.0
Natural gas combustion	0.01	0.02	0.0	0.02	0.23	0.28
Wood sanding	1.10	1.10	0.0	0.0	0.0	0.0
Total of Modification	5.88	5.89	0.0	12.33	0.23	0.28
PSD Threshold Level	250	250	250	250	250	250
Total of Source	10.0	10.06	0.01	70.18	1.01	1.21
Part 70 Threshold Level	N/A	100	100	100	100	100

* PM and PM10 emissions represent emissions after control.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from the new units, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(c) This wood door and molding finishing plant is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63.800, Subpart JJ) “National Emission Standard for Wood Furniture Manufacturing Operations”, because the potential to emit (PTE) does not exceed 10 tons per year for any single HAP or 25 tons per year for any combination of HAPs. Pursuant to 40 CFR 63.800(a), the requirements of Subpart JJ do not apply.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit each pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAP))

This source will emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Particulate from the stain booth, the two (2) finish booths, the two (2) vacuum coaters, the spray coater, and the combo booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

The stain booth, two (2) finish booths, spray coater, and combo booth each use dry filters for particulate control and the two (2) vacuum coaters each use a baffle/dry filter system for particulate control, therefore the surface coating operations are in compliance with this rule.

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from the requirements of 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes). Since the wood door sander and the wood molding sander each have potential particulate emissions of 0.25 pound per hour, they are not subject to this rule.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The paint spray booths and vacuum coaters are subject to this rule because they were constructed after July 1, 1990 and have actual VOC emissions greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood doors and moldings shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The stain booth, two (2) finish booths, and the combo booth each use the HVLP spray application method; the two (2) vacuum coaters use the vacuum coating method which is one type of dip-and-drain application method; and the spray coater uses an airless spray application system; therefore, all are in compliance with this rule.

There are no other applicable Article 8 rules.

Conclusion

The construction and operation of this wood door and molding finishing operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 003-15236-00262.

Appendix A: Emission Calculations Summary

Company Name: Milliken Millwork, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Suite #1199, Fort Wayne, Indiana 46803
Minor Source Operating Permit No.: 003-15236
Plt ID: 003-00262
Reviewer: Trish Earls/EVP
Date: March 5, 2002

Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	Door and Molding Sanding Operation*	**TOTAL****
PM	86.37	0.02	1.10	87.49
PM10	86.37	0.09	1.10	87.56
SO2	0.00	0.01	0.00	0.01
NOx	0.00	1.21	0.00	1.21
VOC	70.11	0.07	0.00	70.18
CO	0.00	1.02	0.00	1.02
total HAPs	0.00	0.02	0.00	0.02
worst case single HAP	0.00	0.02	0.00	0.02

Total emissions based on rated capacity at 8,760 hours/year.

* Consists of one (1) wood door sander and one (1) wood molding sander which are connected to a collection device. The sanding is done between coatings and is done to remove any roughness that is present after the first coat.

Controlled/Limited Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	Door and Molding Sanding Operation	**TOTAL****
PM	8.86	0.02	1.10	9.98
PM10	8.86	0.09	1.10	10.05
SO2	0.00	0.01	0.00	0.01
NOx	0.00	1.21	0.00	1.21
VOC	70.11	0.07	0.00	70.18
CO	0.00	1.02	0.00	1.02
total HAPs	0.00	0.02	0.00	0.02
worst case single HAP	0.00	0.02	0.00	0.02

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Milliken Millwork, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Suite #1199, Fort Wayne, Indiana 46803
Minor Source Operating Permit No.: 003-15236
PIt ID: 003-00262
Reviewer: Trish Earls/EVP
Date: March 5, 2002

Emission Unit	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain Booth	Stain Base	8.24	88.36%	71.5%	16.9%	44.3%	10.26%	0.10000	10.000	2.50	1.39	1.39	33.42	6.10	1.05	13.57	75%
Finish Booth #1	Top Coat Clear	8.26	66.01%	60.5%	5.5%	34.2%	29.12%	0.12500	25.000	0.69	0.45	1.41	33.95	6.20	9.61	1.55	75%
Finish Booth #2	Top Coat Clear	8.26	66.01%	60.5%	5.5%	34.2%	29.12%	0.12500	25.000	0.69	0.45	1.41	33.95	6.20	9.61	1.55	75%
Finish Booth #1	Primer	10.31	33.79%	28.8%	5.0%	7.1%	43.96%	0.12500	25.000	0.55	0.51	1.61	38.59	7.04	23.36	1.17	75%
Finish Booth #2	Primer	10.31	33.79%	28.8%	5.0%	7.1%	43.96%	0.12500	25.000	0.55	0.51	1.61	38.59	7.04	23.36	1.17	75%
Finish Booth #1	Pure White	10.37	51.87%	38.6%	13.2%	20.1%	33.36%	0.12500	25.000	1.72	1.37	4.29	102.90	18.78	17.08	4.11	75%
Finish Booth #2	Pure White	10.37	51.87%	38.6%	13.2%	20.1%	33.36%	0.12500	25.000	1.72	1.37	4.29	102.90	18.78	17.08	4.11	75%
Vacuum Coater #1	Stain Base	8.24	88.36%	71.5%	16.9%	44.3%	10.26%	0.00035	5000.000	2.50	1.39	2.44	58.49	10.67	0.74	13.57	90%
Vacuum Coater #2	Top Coat Clear	8.26	66.01%	60.5%	5.5%	34.2%	29.12%	0.00035	5000.000	0.69	0.45	0.79	19.01	3.47	2.15	1.55	90%
Spray Coater	Top Coat Clear	8.26	66.01%	60.5%	5.5%	34.2%	29.12%	0.00087	3600.000	0.69	0.45	1.42	34.02	6.21	34.66	1.55	10%
Combo Booth	Stain Base	8.24	88.36%	71.5%	16.9%	44.3%	10.26%	0.10000	10.000	2.50	1.39	1.39	33.42	6.10	1.05	13.57	75%
Combo Booth	Top Coat Clear	8.26	66.01%	60.5%	5.5%	34.2%	29.12%	0.10000	10.000	0.69	0.45	0.45	10.86	1.98	3.07	1.55	75%
Potential Emissions			**Add worst case coating to all solvents**									**16.01**	**384.16**	**70.11**	**86.37**		

Emission Unit	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Stain Booth	0.00%	91.50%	**1.39**	**33.42**	**6.10**	**0.09**
Finish Booth #1	0.00%	91.50%	**4.29**	**102.90**	**18.78**	**1.99**
Finish Booth #2	0.00%	91.50%	**4.29**	**102.90**	**18.78**	**1.99**
Vacuum Coater #1	0.00%	99.00%	**2.44**	**58.49**	**10.67**	**0.01**
Vacuum Coater #2	0.00%	99.00%	**0.79**	**19.01**	**3.47**	**0.02**
Spray Coater	0.00%	87.00%	**1.42**	**34.02**	**6.21**	**4.51**
Combo Booth	0.00%	91.50%	**1.39**	**33.42**	**6.10**	**0.26**
		Total Controlled Emissions:	**16.01**	**384.16**	**70.11**	**8.86**

METHODOLOGY

surcoat.wk4 9/95

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Note: (1) All coatings used do not contain HAPs, therefore, there are no HAP emissions.
(2) Gallons per unit and units per hour for the Spray Coater represent gallons per feet and feet per hour, respectively.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Milliken Millwork, Inc.**
Address City IN Zip: **2701 South Coliseum Blvd., Suite #1199, Fort Wayne, Indiana 46803**
Minor Source Operating Permit No.: **003-15236**
Plt ID: **003-00262**
Reviewer: **Trish Earls/EVP**
Date: **January 15, 2002**

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr	
0.64	New	5.6	includes two (2) 0.25 MMBtu/hr space heaters, one (1) 0.06 MMBtu/hr dry room heater and one (1) 0.075 MMBtu/hr over head heater.
2.13	Existing	18.7	includes two (2) 0.441 MMBtu/hr drying ovens and five (5) 0.25 MMBtu/hr space heaters.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr (New)	0.01	0.02	1.7E-03	0.28	0.02	0.23
Potential Emission in tons/yr (Existing)	0.02	0.07	0.01	0.93	0.05	0.78
TOTAL	**0.02**	**0.09**	**0.01**	**1.21**	**0.07**	**1.02**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

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HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr (New)	5.8E-06	3.3E-06	2.1E-04	5.0E-03	9.5E-06
Potential Emission in tons/yr (Existing)	2.0E-05	1.1E-05	7.0E-04	1.7E-02	3.2E-05
TOTAL	**2.5E-05**	**1.5E-05**	**9.1E-04**	**2.2E-02**	**4.1E-05**

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	**Total**
Potential Emission in tons/yr (New)	1.4E-06	3.1E-06	3.9E-06	1.1E-06	5.8E-06	
Potential Emission in tons/yr (Existing)	4.7E-06	1.0E-05	1.3E-05	3.5E-06	2.0E-05	
TOTAL	**6.1E-06**	**1.3E-05**	**1.7E-05**	**4.6E-06**	**2.5E-05**	**2.3E-02**

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.